

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No: 18-CR-10391-RGS
)	
DEREK SHEEHAN,)	
Defendant.)	
_____)	

JOINT MOTION TO RESCHEDULE STATUS CONFERENCE AND EXCLUDE TIME

The United States of America, by and through the undersigned Assistant United States Attorney, and the defendant, by and through his attorney, jointly request that the status conference scheduled for April 18, 2019 be rescheduled to some other date convenient for the Court and the parties, to allow further time for the government to complete its response to discovery requests by the defendant. The parties also respectfully move this Court to exclude the time period from April 18, 2019 through and including the rescheduled status conference date from the speedy trial clock, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), on the ground that the ends of justice served by excluding this period outweigh the best interests of the public and the Defendant in a speedy trial. The parties jointly agree that this period constitutes “the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” and that the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

/s/ William Keefe
William Keefe
Attorney for Derek Sheehan

By: /s/ Anne Paruti
Anne Paruti
Assistant United States Attorney

Dated: April 18, 2019

CERTIFICATE OF SERVICE

I, Anne Paruti, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Anne Paruti
Assistant United States Attorney

Dated: April 18, 2019